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February 12, 2015

BY ECF

The Honorable Andrew J. Peck
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Ronard Lora, et al., v. J.V. Car Wash, Ltd., et al., No. 11-CV-9010 (LLS) (AJP)

Dear Judge Peck:

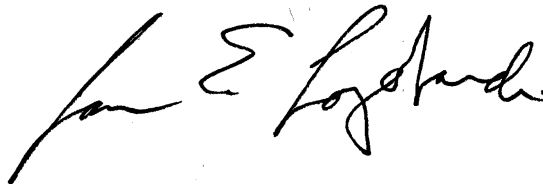
We have received the letter from Wendy J. Mellk, Esq., Special Litigation Counsel to the Chapter 11 Trustees for the Car Wash Defendants and Defendant Jose Vazquez, regarding the parties' discussions on our attorneys' fees and costs in the above-referenced matter.

The only proposal that we received from the Trustees arrived after 3:00 p.m. yesterday afternoon, and offered essentially less than one-third of the amount recovered on behalf of the Plaintiffs in payment of our fees. While counsel for the Chapter 11 Trustees may consider this amount "substantial and reasonable," we advised them last evening that their proposal was not acceptable, as it disregarded the fee-shifting requirements of the Fair Labor Standards Act and the New York Labor Law. As Your Honor knows, both statutes provide for an award of attorneys' fees based, in part, on the time spent by the plaintiffs' attorneys and the attorneys' hourly rate. Plaintiffs' counsel are not relegated to a percentage of the amount recovered for plaintiffs as their fee.

Accordingly, we will be contacting Judge Stanton's chambers to make arrangements for filing a fee application before him.

We thank the Court for its efforts on this matter.

Respectfully submitted,



Laura E. Longobardi

LEL:

cc: Wendy J. Mellk, Esq. (by ECF)
Daniel M. Stolz, Esq. (by electronic mail)
Stacy L. Meisel, Esq. (by electronic mail)